

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	FCC 06-14

REPLY COMMENTS OF THE MAINE PUBLIC UTILITIES COMMISSION

The Maine Public Utilities Commission (MPUC) submits these Reply Comments in response to the Federal Communications Commission's (FCC) Fifth Further Notice of Proposed Rulemaking (FFNPR) concerning further implementation of mandatory thousand-block number pooling.

In general, the MPUC supports the comments submitted by our fellow state commissions (*see* Comments submitted by the public utilities commissions of California, Idaho, Indiana, Iowa, Kansas, Missouri, Nebraska, New York, New Jersey, New Mexico, Pennsylvania, South Dakota, and Texas.) Specifically, we support blanket delegation of authority from the FCC to state regulatory commissions to determine if and when mandatory thousand block pooling should be expanded to areas outside of the top 100 MSAs and/or areas outside those already covered by earlier delegations of authority.

As noted by other state commissions, history clearly shows that state commissions have acted diligently and responsibly in exercising delegated numbering authority and in their implementation of thousand block pooling. The MPUC has worked cooperatively with the FCC and the industry since 1999 to develop and implement

thousand block pooling in Maine and across the nation. The results of our efforts are clear: in 1998 NANPA forecasted the 207 NPA would exhaust in 2000, today NANPA forecasts an exhaust date of 2013. We cannot, however, rest on our laurels. In Maine, only wire centers served by Verizon-Maine are required to pool, leaving areas served by Maine's 22 independent rural telephone companies outside of the pooling requirements. While the MPUC has yet to lift the rural exemption for any of its ITCs, many ITC service territories have already experienced competition from wireless and VOIP providers – both of which use numbering resources. We expect this trend to continue and to eventually include cable phone service.

If rural areas are not included in pooling and new providers are assigned a full NXX in each rate center rather than a thousand block, the projected exhaust date for the 207 NPA will move forward precipitously. Specifically, Maine's ITCs have approximately 113 NXXs assigned to them. According to NANPA, there are only 170 NXXs left in the 207 NPA. Accordingly, it would take fewer than two providers asking to serve all ITCs' areas before the 207 NPA was completely exhausted. Given the costs and inconvenience associated with implementing a new area code, the MPUC needs the flexibility to require its ITCs to implement thousand block pooling if we find, after conducting our own proceeding, that local conditions necessitate such action.

Rather than repeat arguments made by our fellow state commissions, we specifically adopt and support the comments of the New York Public Service Commission, the California Public Utilities Commission, and the National Association of Regulatory Utility Commissions (NARUC).

Thus, we respectfully request that the FCC delegate to state commissions the authority to extend mandatory thousand block pooling to areas outside of the top 100 MSAs and/or areas outside those already covered by earlier delegations of authority.

Respectfully,

MAINE PUBLIC UTILITIES COMMISSION

/s/ Trina M. Bragdon
Trina M. Bragdon, Esq.
Deputy Director of Telecommunications
Maine Public Utilities Commission

Dated: June 9, 2006

CERTIFICATE OF SERVICE

I, Trina M. Bragdon, certify that these Comments of the Maine Public Utilities Commission were filed electronically with the Federal Communications Commission on this date.

/s/ Trina M. Bragdon
Trina M. Bragdon

Dated: June 9, 2006